

Thomas E. Frankovich
 Thomas E. Frankovich,
 A Professional Law Corporation
 4328 Redwood Hwy., Suite 300
 San Rafael, CA 94903
 Telephone: 415/674-8600
 Facsimile: 415/674-9900

Attorneys for Plaintiff CRAIG YATES

Charles L. Post, State Bar No. 160443
 Lizbeth V. West, State Bar No. 207137
 weintraub genshlea chediak
 a law corporation
 400 Capitol Mall, 11th Floor
 Sacramento, California 95814
 Telephone: 916/558-6000
 Facsimile: 916/446-1611

Attorneys for Defendants
 STORE 24 EXPRESS, INC., Trustee of the
 VELLOO FAMILY 2008 TRUST; and SANDRA
 HANSON-VELLOO, Trustee of the
 VELLOO FAMILY 2008 TRUST

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

CRAIG YATES, an individual,

 Plaintiff,

 v.

STORE 24 EXPRESS, INC.; PALANI VELLOO,
 Trustee of the VELLOO FAMILY 2008 TRUST;
 SANDRA HANSON-VELLOO, Trustee of the
 VELLOO FAMILY 2008 TRUST,

 Defendants.

Case No. CV-11-1945-EDL

STIPULATION FOR FURTHER EXTENSION
 OF TIME FOR DEFENDANTS TO RESPOND
 TO COMPLAINT; ~~PROPOSED~~ ORDER

Pursuant to Local Rule 6.1(a), Plaintiff CRAIG YATES, and Defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST, by and through their

1 respective counsel, respectfully request and make the following stipulation:

2 1. Whereas, defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of
3 the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO
4 FAMILY 2008 TRUST have been served with the summons and complaint; and

5 2. Whereas, defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of
6 the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO
7 FAMILY 2008 TRUST's responsive pleading was originally due on June 13, 2011 and
8 Defendants received an extension of time to file a responsive pleading to July 11, 2011; and

9 3. Whereas, defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of
10 the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO
11 FAMILY 2008 TRUST are requesting an additional thirty (30) day) extension of time to file a
12 responsive pleading to August 11, 2011; and

13 4. Whereas, pursuant to the General Order 56, ¶13 and 4, the parties were
14 required to hold the Joint Site Inspection by August 1, 2011; and

15 5. Whereas, the Joint Site Inspection took place on June 13, 2011;

16 6. Whereas, defendant STORE 24 EXPRESS, INC. has received the report from
17 Plaintiff's consultant regarding the Joint Site Inspection which took place on June 13, 2011;

18 7. Whereas, the parties are actively attempting to negotiate a settlement in this
19 matter and wish to reduce fees, costs and litigation expenses in so doing; and

20 8. Whereas, the parties believe it would be in the interest of efficiency and
21 economy to extend the deadline for defendants STORE 24 EXPRESS, INC.; PALANI VELLOO,
22 Trustee of the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the
23 VELLOO FAMILY 2008 TRUST to file a responsive pleading and allow time to negotiate an
24 agreement; and

25 9. Whereas, plaintiff CRAIG YATES has agreed to grant an additional thirty (30)
26 day extension of time for defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of
27 the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO
28 FAMILY 2008 TRUST to file a responsive pleading; and

10. Whereas, defendants' counsel further stipulates that defendants will comply with any and all due dates dictated by the Federal Rules of Civil procedure, the Local Rules of Court, and/or any scheduling order issued by this court prior to the date on which defendants' responsive pleading is due.

IT IS HEREBY STIPULATED:

That the last day for defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST's time to file a responsive pleading to Plaintiff's Complaint be extended up to and including August 11, 2011.

IT IS SO STIPULATED.

Dated: July 13, 2011

THOMAS E. FRANKOVICH
A Professional Law Corporation

By: 

Thomas E. Frankovich
Attorneys for Plaintiff CRAIG YATES

Dated: July 13, 2011

WEINTRAUB GENSHLEA CHEDIAK
a law corporation

By: 

Charles L. Post

Attorneys for Defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST

weintraub genshlea chediak
LAW CORPORATION

ORDER

IT IS HEREBY ORDERED that the time for defendants STORE 24 EXPRESS, INC.; PALANI VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST; SANDRA HANSON-VELLOO, Trustee of the VELLOO FAMILY 2008 TRUST to file a responsive pleading to Plaintiff's Complaint is extended up to and including August 11, 2011.

IT IS SO ORDERED.

Dated: July 15, 2011

